

Before the  
FEDERAL COMMUNICATIONS COMMISSION

In response to: )  
 )  
Amendment of Part 97 of the Commission's ) **RM-11306**  
 )  
Rules Governing the Amateur Radio Services)

**Comments Supporting RM-11306**  
**By**  
**Edwin C Jones, MD, Ph.D. (AE4TM)**

**1. *BACKGROUND AND INTRODUCTION***

I am an active Amateur radio operator, and ARRL member, with both a Ph.D. degree in physics, to include 28 scientific journal publications with the Department of Energy, and an MD degree practicing Psychiatry and Neurology at a Level 5 USA Trauma Center.

I am here to fully support the ARRL Petition, RM-11306, due to Part 97 restrictions which are now outdated and currently restrict advanced communications technology development.

## ***2. DISCUSSION***

In my opinion the ARRL, whose leadership is made by the majority vote of the amateur radio community, best represent the Amateur Service with their Petition. There will obviously never be any consensus within the Amateur service, but there are minorities of others within the amateur radio community who disagree with the ARRL Petition, and have aggressively promoted their point-of-view by posting negative comments to commonly read Internet forums. It is obvious to me that posting titles such as the ones shown in EXHIBIT A, now listed on the front pages of two very high profile public Amateur radio Internet bulletin boards, are purposely written to create enough fear and anxiety to motivate negative comments to the FCC regarding so called "ROBOTS," a term used there to negatively describe any and all activities under Part 97.221. These forums, which contain "scare tactics" certainly not based on true facts or accurate logic, have certainly been effective in motivating the average amateur radio operators to file opposing comments to the FCC. Based on the emotionally charged title and language in these posts, *who wouldn't?* I urge the FCC to carefully consider such comments regarding "ROBOTS" in light of the information provided within these forums.

The wideband segmentation proposed in the ARRL Petition was not meant to be a "phone band." It specifically states that the segment is to contain any mode that falls within the appropriate occupied bandwidths. The Petition also suggests that voluntary band planning, which is truly the responsibility of the Amateur community, will provide the added segmentation necessary for proper operation. Bandwidth segmentation with proper voluntary band planning will certainly have the flexibility to change over a period of time as the popularity of its use changes, and without the need to move formal

regulatory boundaries set forth by formal rule making. Such voluntary segmentation successfully exists today, but constrained by mode segregation. Networks as well as modes of operation find their proper spaces as best they can in the current regulatory environment now regulated by mode of operation. Segmentation by bandwidth will allow the continuation of successful voluntary band planning, but with the flexibility to further define such operations without impeding the Radio Art by combining digital voice, data and image transfer as well. Such operations by their very nature are most effective under “remote and local control” but certainly not with the 500 Hz bandwidth restrictions per Part 97.221(c). Therefore, again, I agree with the ARRL petition and request the deletion of 97.221(c).

The ARRL Proposed bandwidth segmentation plan was devised as an attempt to decrease potential interference between stations while providing an opportunity to advance the Radio Art by segregating radio communication modes based on their bandwidth requirements rather than their mode and type of operation. Such a plan is essential to the future of Amateur service due to the rapid proliferation of new and more advanced communications modes and systems that now attempt to use the provided spectrum. In the current domestic Amateur frequency bands, which are formally and statically specifying regions for use by mode, the opportunity for the further development of newer and more efficient modes and systems does not have room to develop. The ARRL proposed plan is intended to promote this further development by giving any new modes room on the amateur radio bands to operate, thereby providing the opportunity for their development.

### ***3. CONCLUSION***

In summary, I find it disturbing that a minority of radio operators are currently using public forums to generate negative comments towards the

ARRL plan by tapping in on the emotional fears of the average amateur radio operator rather than dealing with the logic of the subject content, regardless of their point-of-view regarding the ARRL Petition. I sincerely hope the FCC seriously considers RM-11306 because it will certainly provide an opportunity to promote the development of the Radio Art as defined in Part 97.1, while continuing to effectively allow existing modes use of the Amateur service.

Respectively submitted,

Edwin C. Jones, MD, Ph.D. (AE4TM)

11489 Via Lagos

Loma Linda, CA 92354

**EXHIBIT A. An example of a high profile forum used to encourage mass mailing (see bottom) of comments opposing the ARRL proposed band plan.**

**Topic: The Email Robots are coming to the phone bands!, ARRL wants Email robots in phone bands**  
**[Kh6ty](#)** Posted: Jan. 25 2006,06:09

In the ARRL "bandwidth" petition, RM-11306, Pactor-III Email robots, 2.4 KHz wide (requiring a channel width of 2.5 KHz), are allowed everywhere phone is allowed, which on 20m is 14100 to 14350 KHz.

The current practice of Winlink 2000, where Pactor-II is allowed, which is anywhere in the RTTY/Data/CW segment of the bands, is to scan two or more channels by each fully automatic Pactor-II Email robot.

**THIS IS DONE JUST SO THE MOBILE STATIONS WILL NOT HAVE TO WAIT AS LONG AS 4 MINUTES FOR A FREQUENCY THAT IS BEING USED BY ANOTHER EMAIL ROBOT**, and so they can go to another frequency where there is no Email robot, even if there is already a CW or SSB station there, and let an Email robot just take over the frequency.

If a single Pactor-III Email robot requires a 2.5 KHz channel, then a fully automatic Email robot scanning two channels will use 5 kHz.

There are currently 25 Winlink Email robots in the US and another 25 overseas, some of which can still interfere with communications in the US. There are another, perhaps 25, Email Robots assigned for Emcomm use by Winlink.

Assuming an average of 40 Winlink Email robots can be heard worldwide on 20 meters, and each one automatically scans only two frequencies, then 40 Email robots will take up  $40 \times 5 = 200$  kHz of the 20 meter phone band, which is 80% of the phone band!

ARRL claims that the operator triggering the Email robot to transmit should not allow it to transmit on a busy frequency, but of course, it usually does anyway, or it just may not hear stations in QSO local to the robot but remote to itself, so the Email robot can just wipe out the local QSO, as is so often the practice now for CW and PSK31 QSO's, **AND THIS WILL BECOME A REALITY FOR ALL PHONE OPERATORS IF RM-11306 is adopted.**

If you think that sacrificing 80% of the 20 meter phone band to be used for Email messaging for Winlink's less than 1% of the US ham population is a good idea, you should file comments with the FCC stating that you agree with the ARRL rewording of Part 97.221.

**BUT, IF YOU THINK THAT EMAIL ROBOTS SHOULD BE CONFINED TO A SEPARATE SPACE ON THE BANDS, THEN YOU ALSO NEED TO FILE COMMENTS TO THE FCC AND LET THEM KNOW YOUR POSITION!**

It is as easy as 1-2-3-4 to file a comment!

1. Go to [http://gullfoss2.fcc.gov/prod/ecfs/upload\\_v2.cgi](http://gullfoss2.fcc.gov/prod/ecfs/upload_v2.cgi)
2. Fill in RM-11306 (in all caps) where it says "1. Proceeding"
3. Fill in the rest of the spaces with your name and address where indicated

4. Type a brief comment to the FCC where it says "Send a Brief Comment to FCC (typed-in)

**Please** make an effort to file a comment on RM-11306 before February 5!